



# Your Missouri Courts

.net

Search for Cases by: Select Search Method... ▼

Judicial Links | eFiling | Help | Contact Us | Print

GrantedPublicAccess Logoff EDWARD\_ZEIDLER

2222-CC08421 - DEREK STEINBROOK V SPEE-DEE COURIER INC ET AL (E-CASE)

Case File Parties & Attorneys Docket Entries Charges, Judgments & Sentences Service Information Filings Due Scheduled Hearings & Trials Civil Judgments Garnishments/Execution

[Click here to eFile on Case](#)

[Click here to Respond to Selected Documents](#)

Sort Date Entries: ●

Descending

○ Ascending

Display Options:

All Entries ▼

08/31/2022 ☐ Notice of Service

Return of Service.

**Filed By:** BRENT ALAN SUMNER

**On Behalf Of:** DEREK STEINBROOK

☐ Return Service - Other

Document ID - 22-SMOS-2045; Served To - SPEE-DEE COURIER INC.; Server - ; Served Date - 25-AUG-22; Served Time - 00:00:00; Service Type - Other; Reason Description - Served

08/29/2022 ☐ Summons Personally Served

Document ID - 22-SMOS-2046; Served To - ROESCH, NATHAN K; Server - ; Served Date - 23-AUG-22; Served Time - 20:10:00; Service Type - Sheriff Department; Reason Description - Served

07/27/2022 ☐ Jury Trial Scheduled

**Scheduled For:** 01/17/2023; 9:00 AM ; MICHAEL FRANCIS STELZER; City of St. Louis

07/19/2022 ☐ Summ Issd- Circ Pers Serv O/S

Document ID: 22-SMOS-2046, for ROESCH, NATHAN K.

☐ Summ Issd- Circ Pers Serv O/S

Document ID: 22-SMOS-2045, for SPEE-DEE COURIER INC..

☐ Confid Filing Info Sheet Filed

**Filed By:** BRENT ALAN SUMNER

☐ Note to Clerk eFiling

**Filed By:** BRENT ALAN SUMNER

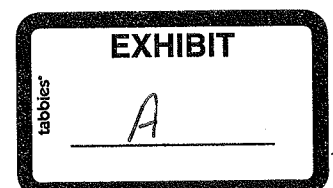
☐ Pet Filed in Circuit Ct

Petition.

**Filed By:** BRENT ALAN SUMNER

**On Behalf Of:** DEREK STEINBROOK

☐ Judge Assigned





IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

RECEIVED AUG 11 2022

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2222-CC08421
Plaintiff/Petitioner: DEREK STEINBROOK	Plaintiff's/Petitioner's Attorney/Address: BRENT ALAN SUMNER 7777 BONHOMME STE. 2100 CLAYTON, MO 63105
Defendant/Respondent: SPEE-DEE COURIER INC.	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Pers Injury-Vehicular	(Date File Stamp)

### Summons for Personal Service Outside the State of Missouri (Except Attachment Action)

The State of Missouri to: SPEE-DEE COURIER INC.  
Alias: FKA SPEE DEE DELIVERY SERVICE INC

DANIEL A HUNTLEY, RAGT  
120 W STATE ST SUITE 400  
ROCKFORD, IL 61101

WINNEBAGO COUNTY,  
ILLINOIS

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

July 19, 2022

Date

Clerk

Further Information:

### Officer's or Server's Affidavit of Service

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is DEPUTY of WINNEBAGO County, IL (state).
3. I have served the above summons by: (check one)
  - ☒ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at 120 W. STATE ST. SUITE 400 (address)  
in WINNEBAGO County, IL (state), on 8/25/22 (date) at 1045 (time).

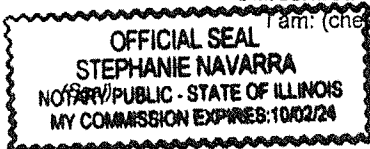
PATRICK HASTINGS

Printed Name of Sheriff or Server

Pat Hastings

Signature of Sheriff or Server

Subscribed and sworn to before me this 25th (day) August (month) 2022 (year).



I am: (check one)

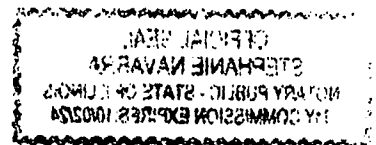
- ☒ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

Stephanie Navarra Executive Assistant  
Signature and Title

### Service Fees

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.



### Directions to Officer Making Return on Service of Summons

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The office making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.






## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

FILED  
22ND JUDICIAL CIRCUIT  
CIRCUIT CLERK'S OFFICE  
22 AUG 29 AM 9:15

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2222-CC08421	(Date File Stamp)
Plaintiff/Petitioner: DEREK STEINBROOK	Plaintiff's/Petitioner's Attorney/Address: BRENT ALAN SUMNER 7777 BONHOMME STE. 2100 CLAYTON, MO 63105	
Defendant/Respondent: SPEE-DEE COURIER INC.	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Pers Injury-Vehicular		

**Summons for Personal Service Outside the State of Missouri**  
(Except Attachment Action)

The State of Missouri to: NATHAN K ROESCH Alias: 2404 FOUR LAKES DRIVE BELLEVILLE, IL 62220   COURT SEAL OF CITY OF ST LOUIS	ST CLAIR COUNTY, ILLINOIS  You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action. July 19, 2022  Date Further Information:	Thomas Bloppinger Clerk
--	--	----------------------------

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is Deputy Sheriff of St Clair County, IL (state).
- I have served the above summons by: (check one)
  - ☒ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at 2404 Four Lakes Dr, Belleville, (address)  
 in ST CLAIR County, IL (state), on 8-23-22 (date) at 8:10pm (time).

Steven F. Bostick #365

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

## Service Fees

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

ENTERED

AUG 30 2022

MAM



### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2222-CC08421	
Plaintiff/Petitioner: DEREK STEINBROOK	Plaintiff's/Petitioner's Attorney/Address: BRENT ALAN SUMNER 7777 BONHOMME STE. 2100 CLAYTON, MO 63105	
Defendant/Respondent: SPEE-DEE COURIER INC.	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Pers Injury-Vehicular		

**Summons for Personal Service Outside the State of Missouri**  
(Except Attachment Action)

The State of Missouri to: NATHAN K ROESCH  
Alias:

2404 FOUR LAKES DRIVE  
BELLEVILLE, IL 62220

**ST CLAIR COUNTY, ILLINOIS**

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

**July 19, 2022**

Date

Further Information:

Clerk

**Officer's or Server's Affidavit of Service**

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
3. I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees**

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.



### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.


Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2222-CC08421	
Plaintiff/Petitioner: DEREK STEINBROOK	Plaintiff's/Petitioner's Attorney/Address: BRENT ALAN SUMNER 7777 BONHOMME STE. 2100 CLAYTON, MO 63105	
Defendant/Respondent: SPEE-DEE COURIER INC.	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Pers Injury-Vehicular		

**Summons for Personal Service Outside the State of Missouri**  
(Except Attachment Action)

The State of Missouri to: SPEE-DEE COURIER INC. Alias: FKA SPEE DEE DELIVERY SERVICE INC  DANIEL A HUNTLEY, RAGT 120 W STATE ST SUITE 400 ROCKFORD, IL 61101   COURT SEAL OF CITY OF ST LOUIS	WINNEBAGO COUNTY, ILLINOIS  You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action. <p align="center"><b>July 19, 2022</b></p> <p align="right"><i>Thomas Kloppeinger</i> Clerk</p>
Date	Further Information:

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
 in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and sworn to before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees**

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.

IN THE CIRCUIT COURT OF ST. LOUIS CITY  
STATE OF MISSOURI

DEREK STEINBROOK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No.:
	)	
	)	Division No.
SPEE-DEE COURIER, INC. f/k/a SPEE	)	
DEE DELIVERY SERVICE, INC.,	)	
Serve:	)	
Daniel A. Huntley, Registered Agent	)	
120 W. State St, Suite 400	)	
Rockford, Illinois 61101	)	
	)	JURY TRIAL REQUESTED
and	)	
	)	
NATHAN K. ROESCH,	)	
Serve:	)	
Nathan K. Roesch	)	
2404 Four Lakes Drive	)	
Belleville, Illinois 62220	)	
	)	
Defendants.	)	

**PETITION FOR DAMAGES**

COMES NOW Plaintiff Derek Steinbrook, by and through The Sumner Law Group LLC, and for his cause of action against Defendants Spee-Dee Courier, Inc. f/k/a Spee Dee Delivery Service, Inc. and Nathan K. Roesch, states as follows:

**PARTIES & GENERAL ALLEGATIONS**

1. Plaintiff is a resident of St. Louis, St. Louis County, Missouri.
2. Defendant, Spee-Dee Courier, Inc. f/k/a Spee Dee Delivery Service, Inc. (hereinafter "Spee Dee Delivery Service, Inc."), is an active, domestic corporation within the State of Illinois and pursuant to RSMO 506.150(5) is subject to service of process upon its registered agent, Daniel Huntley.

3. Defendant, Nathan K. Roesch, is and was at all times relevant herein a resident of Belleville, St. Clair County, Illinois.
4. The vehicle collision hereinafter specifically mentioned occurred in St. Louis City, Missouri; and that the Court has jurisdiction over the subject matter of this action and personal jurisdiction over both Defendants.
5. Gravois Avenue is a public and open roadway within the County of St. Louis, State of Missouri.
6. On June 19, 2019, Plaintiff was operating a motorcycle on Gravois Avenue.
7. On June 19, 2019, Defendant Nathan K. Roesch was operating a commercial truck in the course and scope of his employment with Spee Dee Delivery Service, Inc. and was stopped on the right side of Gravois Avenue.
8. Defendant, Nathan K. Roesch, operated the commercial truck in such a way as to cause a crash with Plaintiff, which caused the below referenced injuries.

**COUNT I – NEGLIGENCE**  
**DEREK STEINBROOK VS. NATHAN ROESCH**

9. Plaintiff realleges and reincorporates paragraphs 1-8 as if fully set forth herein.
10. Defendant, Nathan Roesch, owed Plaintiff a personal duty to operate the commercial truck with the highest degree of care and to follow all rules of the road, each of which were and are duties owed to all drivers using Missouri roads. His failure to do so was therefore negligent, reckless and careless in the following respects:
  - a) He failed to keep a careful lookout;

- b) He failed to stop, swerve, slacken speed or otherwise take evasive action at a time, when in the exercise of the highest degree of care, Defendant could have known that there was a likelihood of collision;
- c) He made an improper u-turn; and
- d) He failed to yield the right of way to oncoming traffic.

11. That as a direct and proximate result of the Defendant, Nathan K. Roesch's negligence, Plaintiff suffered from and continues to suffer from physical injury.
12. That as a direct and proximate result of the Defendant, Nathan K. Roesch's negligence, Plaintiff suffered and continues to suffer from a head injury, broken jaw, scapula fracture, fractured ribs, spleen injury, back injury, compound fractures to both arms, and injury to his left wrist.
13. Defendant, Nathan K. Roesch should have realized his conduct involved an unreasonable risk of causing physical injury.
14. As a direct and proximate cause of Defendant, Nathan K. Roesch's negligence, Plaintiff has required medical treatment.
15. As a direct and proximate cause of Defendant, Nathan K. Roesch's negligence, Plaintiff will be required to receive medical treatment in the future.
16. That as a result of said injuries, Plaintiff incurred, and will continue to incur significant medical expenses.
17. As a direct and proximate cause of Defendant, Nathan K. Roesch's negligence, Plaintiff has been unable to work and may be unable to work in the future.
18. As a direct and proximate cause of Defendant, Nathan K. Roesch's negligence, Plaintiff lost sums of money due to his inability to work.



WHEREFORE, Plaintiff prays for judgment against Defendant, Nathan K. Roesch, in an amount that is fair and reasonable in excess of Twenty-Five Thousand Dollars (\$25,000.00), pre-judgment interest per Missouri Statute, his costs herein expended and for such other relief as this Court deems just and proper.

**COUNT II – NEGLIGENCE PER SE**  
**DEREK STEINBROOK VS. NATHAN K. ROESCH**

COMES NOW Plaintiff, by and through counsel, and in Count II of his Petition for Damages against Defendant, Nathan K. Roesch, states and alleges the following:

19. Plaintiff hereby incorporates by reference paragraphs 1 through 18 above as though fully set forth below.
20. The City of St. Louis, Missouri adopted the St. Louis City Code of Ordinances. St. Louis, MO Code of Ordinance Section 17.12.020 provides that the driver of any vehicle shall not turn such vehicle so as to proceed in the opposite direction unless such movement can be made in safety and without interfering with other traffic.
21. As a direct and proximate result of the negligence of Defendant, Nathan K. Roesch, Derek Steinbrook was caused to suffer a severe and permanent injury to his head, jaw, scapula, ribs, spleen, back, left arm, right arm and left wrist, severe physical pain, severe mental anguish, required medical and hospital treatment, lost income, and continues to suffer pain and complications to his injuries.
22. The conduct described in Count II created a high degree of probability of injury to others and thereby showed complete indifference to and conscious disregard for the safety of others, including Derek Steinbrook.

WHEREFORE, Plaintiff prays for judgment against Defendant Nathan K. Roesch on Count II of his Petition for Damages for sums that are fair and reasonable, for the costs incurred herein, for

prejudgment interest, for reasonable attorney's fees, and for any other such relief as the Court deems just and proper.

**COUNT III - VICARIOUS LIABILITY**  
**DEREK STEINBROOK VS. SPEE DEE DELIVERY SERVICE, INC.**

23. Plaintiff hereby incorporates by reference paragraphs 1 through 22 above as if fully set forth herein by reference.
24. That at all times relevant herein, Defendant, Nathan K. Roesch, was employed by Spee Dee Delivery Service, Inc.
25. At the time of this incident, Defendant, Nathan K. Roesch, was furthering the business interests of his employer, making it vicariously liable for those actions.

**WHEREFORE**, Plaintiff prays judgment against Defendant, Spee Dee Delivery Service, Inc., in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00), pre-judgment interest, for costs herein incurred, and for such other and further relief as the Court deems just and proper under the circumstances.

Respectfully submitted,

THE SUMNER LAW GROUP, LLC

By /s/ Brent Sumner  
Brent A. Sumner, #59460  
K. Lindsay Rakers, #51754  
7777 Bonhomme Avenue, Suite 2100  
Clayton, Missouri 63105  
Telephone: 314-669-0048  
Fax: 888-259-7550  
brent@sumnerlawgroup.com  
lindsay@sumnerlawgroup.com  
*Attorneys for Plaintiff*